

THE HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CAPITAL VENTURES INTERNATIONAL,

Plaintiff,

v.

NETWORK COMMERCE, INC.; DWAYNE
M. WALKER, Individually and as Chairman of
the Board of Directors, Chief Executive Officer
and Chief Operating Officer of Network
Commerce, Inc.; ALAN D. KOSLOW,
Individually and as the Former Executive Vice-
President, Chief Financial Officer, General
Counsel and Secretary of Network Commerce,
Inc.,

Defendants.

Case No. C02-0682RSL

**STIPULATION AND ORDER RE:
DEPOSITIONS OF STELLMAN
KEEHNEL, ROGER MELLEME, AND
WILLIAM HARVEY**

Plaintiff Capital Ventures International and Defendants Network Commerce, Inc.,
Dwayne Walker, and Alan Koslow, through counsel, hereby stipulate as follows:

(1) The discovery deadline for conducting the depositions of Stellman Keehnel, Roger
Mellem, and William Harvey (collectively, the "Law Firm Witnesses") is deferred pending the
Court's ruling on Defendants' Motion For Partial Summary Judgment Or, In The Alternative, For
Bifurcation [Docket No. 159] and Plaintiff Capital Ventures International's Cross-Motion For
Partial Summary Judgment [Docket No. 175] (collectively, the "Pending Motions").

(2) The parties may conduct depositions of the Law Firm Witnesses following the Court's ruling on the Pending Motions.

Oral argument on the Pending Motions has been set for May 24, 2006. The purpose of this stipulation is to minimize the burden and expense of depositions that may be unnecessary based on the Court's ruling on the Pending Motions.

STIPULATED TO this 2nd day of May, 2006.

DLA PIPER RUDNICK GRAY CARY US LLP

s/ Christopher Huck

Stellman Keehnel, WSBA No. 9309

Brian Buckley, WSBA No. 26423

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Attorneys for Defendants

SAVITT & BRUCE LLP

s/ Duffy Graham

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Stephen Willey, WSBA No. 24499

Attorneys for Plaintiff

IT IS SO ORDERED.

DATED this 3rd day of May, 2006.



Robert S. Lasnik

United States District Judge